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January 26, 2023

VIA ECF

Honorable Kenneth M. Karas
United States District Court Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *USA v. Indigo Grant*
S1 21-Cr-441 (KMK)

Dear Judge Karas:

I am writing to request reconsideration of the Court's Order dated January 26, 2023 denying permission for Indigo Grant to travel to Los Angeles, California from February 3, 2023 returning home on February 6, 2023.

As a preliminary matter, the Government has not argued and the Court has not found that Ms. Grant would present any risk of flight or danger to the community if permitted to travel to Los Angeles, California. While I respectfully suggest that even if Ms. Grant's request to travel was for a purely social reason she should be permitted to travel, the fact that this is for work makes her request to travel even more compelling. She will be in jeopardy of losing a significant client if not allowed to travel and she and the court and the public are best served if she is able to earn a living and support her family as a single parent.

Attached is an email just received from Ms. Grant's supervising Pretrial Services Officer in Georgia wholly supporting her request to go on this trip and advising the Court of the Officer's willingness to monitor her travel.

With regard to the Court's comment in its Order that Ms. Grant mentioned different clients she hoped to be with on this trip, Bud Dupree was in fact mentioned on the original list sent to government. He is affiliated with Warner Records due to his partnership with the label and Ms. Grant then broke down the artists that she has and included them for more details when ask to do so.

For all of the reasons previously mentioned, as well as the additional information herein – most significantly the email from her Pretrial Services Officer – I ask the Court to reconsider the denial of the request to travel.

Thank you for the Court's consideration of this request.

Respectfully submitted,



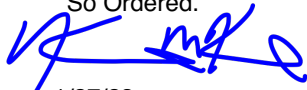
Kerry A. Lawrence

cc: AUSA Nicholas Bradley (via ECF)

Motion is denied. To succeed on a motion for reconsideration, the movant must establish, at a minimum, that the Court overlooked controlling authority or other data. Neither has been established here. Indeed, this Motion ignores the Court's finding that Ms. Grant failed to substantiate her claim that she needed to attend the Grammy's to receive an award. And, the story regarding Bud Dupree has shifted over time. These specious claims, when combined with Ms. Grant's prior dishonesty, are alone sufficient to deny both the original bail application and the Motion for Reconsideration. The bottom line is that Ms. Grant made claims to support changing her bail conditions that she could not back up, thus calling into question her candor with the Court.

Moreover, the Court was fully aware of the view of Pre-Trial Services, but that office does not decide these matters. And, of course, the Court was aware of the prior rulings and history of the reasons to consider Ms. Grant both a danger to the community and a risk of flight. Nothing about the request to attend the Grammy Awards undermined those rulings.

So Ordered.



1/27/23

Kerry Lawrence

From: Krystal Batchelor <Krystal_Batchelor@ganp.uscourts.gov>
Sent: Thursday, January 26, 2023 3:00 PM
To: Kerry Lawrence
Subject: Indigo Grant

Good afternoon,

I have no objections to Ms. Grant's travel request to Los Angeles for employment. During my last visit with Ms. Grant (1/12/23), we discussed her role with the Grammy's and what events will be held for the members of the Grammy organization. She showed me on the Grammy site when she became a member. In April 2022 I submitted a recommendation to the Probation Office in the Southern District of New York to have the location monitoring condition removed. At the time Ms. Grant had been enrolled in the location monitoring program for 9 months and there were no issues of noncompliance. Ms. Grant maintains communication with me when it comes to her employment and provides any documentation when requested. If Ms. Grant was not enrolled in the location monitoring program, I would have authorized her to travel for this work event. Unfortunately the location monitoring condition limits my ability to approve travel. If the court would like for me to contact her clients to inquire about her role for this business trip, I would be willing to do so. Please let me know if you have any additional questions.

Krystal J. Batchelor
Senior United States Probation Officer
Northern District of Georgia
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